

KAMER ZUCKER ABBOTT
 Jen J. Sarafina #9679
 Nicole A. Martin #13423
 3000 West Charleston Boulevard, Suite 3
 Las Vegas, Nevada 89102-1990
 Tel: (702) 259-8640
 Fax: (702) 259-8646
 jsarafina@kzalaw.com
 nmartin@kzalaw.com

Attorneys for Defendant
 NevadaPure, LLC

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JANE DOE,)	Case No. 2:19-cv-01664-JCM-VCF
)	
Plaintiff,)	
)	
vs.)	<u>JOINT STIPULATION AND ORDER</u>
)	<u>TO STAY PROCEEDINGS FOR</u>
)	<u>SIXTY DAYS</u>
NEVADAPURE, LLC, a Nevada limited liability)	
company dba SHANGO LAS VEGAS,)	<u>(First Request)</u>
)	
Defendant.)	
)	

Plaintiff Jane Doe ("Plaintiff"), by and through her counsel, Melanie Hill Law PLLC, and Defendant NevadaPure, LLC dba Shango Las Vegas ("Defendant"), by and through its counsel, Kamer Zucker Abbott, stipulate and request that the Court stay these proceedings for sixty (60) days, through and including June 1, 2020, in light of orders from the state to limit in-person interactions and to close and limit non-essential business operations during the current pandemic. In support of this Stipulation and Request, the parties state as follows:

1. The parties' deadline to submit a Discovery Plan and Scheduling Order ("DPSO") was March 30, 2020. However, the parties have not submitted the DPSO in light of this request.

1 2. In an effort to conserve both the parties' and the court's limited time and resources
2 due to the partial shutdown, the parties seek to stay all proceedings and related deadlines for at least
3 sixty (60) days.

4 3. The parties intend to engage in written discovery, which will be hindered by the closure
5 of third-party businesses and the Defendant's reduced operations. Further, the parties plan to conduct
6 at least two depositions, which would require in-person interactions that should be avoided at this
7 time due to the COVID-19 pandemic and the declaration of a national emergency and Nevada state
8 of emergency. Even video conferencing depositions would require at least a videographer in the same
9 room as both the deposing attorney and the witness being deposed. Further, at least some of the
10 witnesses may be subject to state school and business closures and are expected to stay home at this
11 time.

12 4. In the event the pandemic has been sufficiently suppressed by June 1, 2020, the parties
13 agree to file their DPSO within seven (7) days of the lifting of the stay setting the discovery deadlines
14 in this case.

15 5. In the event the pandemic has been sufficiently suppressed by June 1, 2020, the parties
16 agree that Plaintiffs Opposition deadlines be continued thirty (30) days from the date the stay is lifted
17 to July 1, 2020.

18 6. In the event the pandemic has not been sufficiently suppressed by June 1, 2020, the
19 parties will further confer about requesting an extension of the stay and file an appropriate motion to
20 extend the stay.

21 7. This request to stay proceedings is not sought for any improper purpose or other
22 reason of delay. Rather, it is sought only to conserve the parties' and court's respective resources and
23 efficiently yet responsibly conduct discovery.

24 / / /

1 WHEREFORE, the parties respectfully request that the Court stay proceedings in this case
2 for the next sixty (60) days, up to and including June 1, 2020.

3 DATED this 31st day of March, 2020.

4 Respectfully submitted,

5 MELANIE HILL LAW PLLC

6 /s/ Melanie A. Hill

7 Melanie A. Hill #8796

8 520 S. 7th Street, Suite A

9 Las Vegas, Nevada 89101

10 Tel: (702) 362-8500

11 Fax: (702) 362-8505

12 Attorney for Plaintiff

13 Jane Doe

Respectfully submitted,

KAMER ZUCKER ABBOTT

/s/ Nicole A. Martin

Jen J. Sarafina #9679

Nicole A. Martin #13423

3000 West Charleston Boulevard, Suite 3

Las Vegas, Nevada 89102

Tel: (702) 259-8640

Fax: (702) 259-8646

Attorneys for Defendant

NevadaPure, LLC

14
15
16
17
18
19
20 IT IS SO ORDERED:

21 
22 _____
UNITED STATES DISTRICT JUDGE

23 DATED: April 13, 2020
24 _____